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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

**FLIR SYSTEMS, INC.**, an Oregon  
corporation,

Plaintiff,

v.

**THOMAS L. GAMBARO**, an individual;  
and **MOTIONLESS KEYBOARD  
COMPANY**, an Oregon corporation

Defendants.

Case No. CV 10-0231-BR

**MOTION FOR RECONSIDERATION  
OF RULE 37 (a)(1) COMPELLING  
FLIR DISCOVERY**

**DEMAND FOR JURY TRIAL**

**DEFENDANT PRO SE MOTION FOR EXTENSION OF TIME**

Pursuant to Rule 37 (a)(1) the Defendant Pro Se respectfully requests the court issue an order to compel partial discovery specifically the previously denied by Plaintiff FLIR specified as the "Assembly CAD files for the Accused Products" that Defendant Pro Se requires to present a complete defense and in the Defendant Cross Motion for Partial Summary Judgment. Pursuant to Local Rule 7-1 there have been numerous meetings and conferences resulting in consistent denials for discovery for defense.

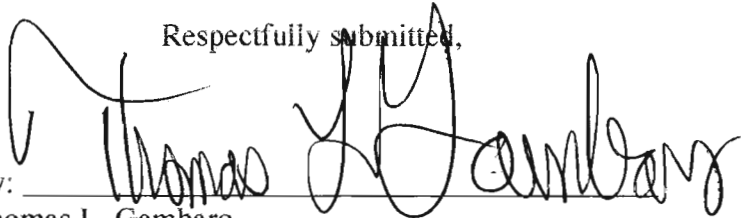
**MOTION FOR RECONSIDERATION OF RULE 37 (a)(1) COMPELLING FLIR  
DISCOVERY**

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This motion is supported by the Declaration of Thomas L. Gambaro in support of the motions relating to Partial Summary Judgment. This request is made in the interest of justice to bring balance to the issues relating to the facts relating to the claim construction at issue from the *Motionless Keyboard Company v. Microsoft Corporation et al* case.

Dated: September 29, 2010

Respectfully submitted,

  
By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 29, 2010, a true copy of the foregoing **MOTION FOR RECONSIDERATION OF RULE 37 (a)(1) COMPELLING FLIR DISCOVERY** was served to the following counsel by hand delivery, electronic filing via e-mail with electronic signature and first class mail:

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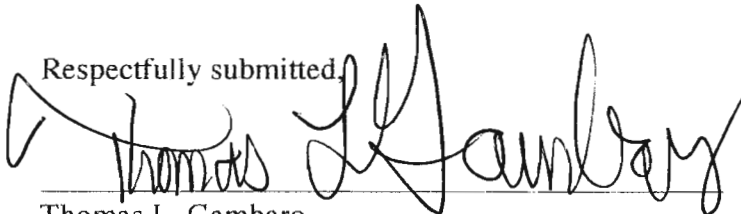
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Attorneys for Plaintiff FLIR Systems, Inc.

Respectfully submitted,

September 29, 2010 By:



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